

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
300 Quarropas Street, White Plains, NY 10601**

JEFFREY THOMAS PIRZINGER,	)	JURY TRIAL DEMANDED
Plaintiff,	)	
	)	
v.	)	
	)	Civil Action No. 7:25-cv-01760-PMH
TRANS UNION LLC,	)	
Defendant.	)	
	)	

**AFFIDAVIT IN SUPPORT OF THE FIRST AMENDED COMPLAINT**  
**STATE OF NEW YORK**  
**COUNTY OF WESTCHESTER**

FILED  
U.S. DISTRICT COURT  
2025 APR 23 AM 10:52  
S.D. OF N.Y.W.

I, Jeffrey Thomas Pirzinger, being duly sworn, depose and state under penalty of perjury:

1. I am the Plaintiff, proceeding pro se, residing at 135 Beechwood Dr, Mamaroneck, NY 10543. I have personal knowledge of the facts in the First Amended Complaint filed on or about April 23 , 2025, against Trans Union LLC (“TransUnion”).
2. This affidavit affirms the truth of the First Amended Complaint’s factual allegations in Section IV (§§ 9-16), based on my personal knowledge and business records, including the FedEx proof-of-delivery attached as Exhibit A.
3. On January 2, 2025, I sent a written communication to TransUnion via FedEx 2-Day Delivery (Tracking #771146841215), disputing 35 inaccurate items in consumer report #450079572-043. The written communication was typed in legible 12-point font, double-spaced, with one-inch margins and numbered pages. The communication included a table listing each inaccurate item, furnisher, account number, disputed

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information, and reason (e.g., “Payment not late”). Specific examples include: ‘ELAN SVCS/FIDELITY, Account #XXXXXXXXX0929, Inaccurate Item: High Balance: \$21,551 from 10/2024 to 11/2024, Reason: Inaccurate amount’; ‘TBOM/FORTIVA, Account #XXXXXXXXX9727, Inaccurate Item: Past Due: \$112, Reason: Inaccurate, \$0 past due’; ‘TD BANK USA/TARGETCREDI, Account #XXXXXXXXX1360, Inaccurate Item: Rating 10/2024 30, Reason: Payment not late.’ I included consumer report #450079572-043, a utility bill, a passport, and a notarized acknowledgment to verify identity and substantiate the inaccuracies. TransUnion received the communication on January 6, 2025, per Exhibit A, signed by Y. Johnson at 555 West Adams St, Chicago, IL 60661.

4. On January 8, 2025, TransUnion sent me a written communication stating that my written communication was “illegible” or “undeterminable,” and TransUnion that did not reinvestigate, address the 35 inaccurate items, or provide any results. As of April 23, 2025, TransUnion has not provided any reinvestigation reports or communications indicating compliance with 15 U.S.C. § 1681i(a)(1)(A) or (a)(6)(A), despite my repeated checks of my mailbox at 135 Beechwood Dr, Mamaroneck, NY 10543.
5. The following events relate to TransUnion’s actions regarding my credit report:
  - a. On December 3, 2024, before my disputes, a lender denied me a \$55,570 vehicle loan, citing adverse items in my TransUnion report which I later disputed.
  - b. On February 22, 2025, after TransUnion’s response, another lender denied me a \$95,865 vehicle loan, citing adverse items in the report.

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d. I have experienced sleeplessness, anxiety, and humiliation from explaining credit issues to lenders and family.

6. I allege TransUnion's failure to reinvestigate or correct the 35 disputed inaccurate items after my January 2, 2025, communication allowed these inaccurate items to persist, contributing to the February 22, 2025, loan denial, my continued reliance on an unsafe vehicle, and my emotional distress.
7. I reserve the right to supplement this affidavit with additional records (e.g., lender letters, mechanic reports) as needed.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

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Executed on this 23rd day of April, 2025, in New York.

by   
Signature

4/23/2025  
Date

Jeffrey Thomas Pirzinger  
135 Beechwood Dr  
Mamaroneck, NY 10543  
T: (914) 497-1104

**NOTARY ACKNOWLEDGMENT**

State of New York )

County of Westchester )

On this 23th day of April, 2025, before me, the undersigned, a Notary Public in and for the State of New York, personally appeared Jeffrey Thomas Pirzinger, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that they executed the same in this capacity, and that by his signature on the instrument, the individual executed the instrument.

Notary Public Signature: 

Printed Name: Gennaro Mazzella

My Commission Expires: 02-27-2026

Notary Public Registration Number: \_\_\_\_\_

**GENNARO MAZZELLA**  
Notary Public - State of New York  
ID No. 01MA6141615  
Qualified in Dutchess County  
My Commission Expires February 27, 2026

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# Exhibit A



January 14, 2025

Dear Customer,

The following is the proof-of-delivery for tracking number: 771146841215

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**Delivery Information:**

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<b>Status:</b>	Delivered	<b>Delivered To:</b>	Receptionist/Front Desk
<b>Signed for by:</b>	Y.JOHNSON	<b>Delivery Location:</b>	555 W ADAMS ST
<b>Service type:</b>	FedEx 2Day		
<b>Special Handling:</b>	Deliver Weekday		CHICAGO, IL, 60661
		<b>Delivery date:</b>	Jan 6, 2025 12:44

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**Shipping Information:**

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<b>Tracking number:</b>	771146841215	<b>Ship Date:</b>	Jan 2, 2025
		<b>Weight:</b>	0.5 LB/0.23 KG

**Recipient:**  
DISPUTE DEPARTMENT, TRANSUNION LLC  
555 W ADAMS ST  
CHICAGO, IL, US, 60661

**Shipper:**  
Jeffrey Thomas Pirzinger,  
135 Beechwood Drive  
Mamaroneck, NY, US, 10543

**Reference**

35 DISPUTED INACCURATE ITEMS OF INFORMATION

Thank you for choosing FedEx